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December 2, 2019

The Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Roe V. St. John's and Doe**  
**19-cv-04694 (PKC-RER)**

Dear Judge Chen:

I write as attorney for plaintiff Richard Roe with regard to Your Honor's direction of November 26, that plaintiff respond by December 3 to St. John's letter motion of November 18 requesting a pre-motion conference. On November 21, I had asked Mr. Zuckerman for an extension of time to respond from November 25 to December 6, 2019, because a) I received his letter when I was out of the country, b) as a member of the First Department Grievance Committee, I had to prepare for and attend a meeting on November 21, and c) I planned to be out of the office November 27 through December 1 for a family holiday in Massachusetts.

Mr. Zuckerman agreed to the extension. I hereby request that Your Honor's direction of a response by December 3 be extended to December 6, 2019.

Respectfully requested,



PGEikenberry

cc by email  
Lyle Zuckerman, Esq.  
Michael Valentine, Esq.

cc by text  
Ms. Jane Doe